



205 N. Michigan Ave., 11th Floor
Chicago, IL 60601

Phone: 312-260-3326

Fax: 312-470-5571

E-mail: deborah.kuhn@verizon.com

Public Service Commission of Wisconsin
RECEIVED: 06/13/08, 10:30:26 AM

Deborah L. Kuhn
Assistant General Counsel – Verizon Great Lakes Region

June 13, 2008

VIA PSC ELECTRONIC REGULATORY FILING SYSTEM

Ms. Sandra Paske, Secretary
Public Service Commission of Wisconsin
P.O. Box 7854
Madison, WI 53707-7854

**Re: *Investigation of Area Code Relief for the 715 Area Code in Northern Wisconsin*
PSCW Docket No. 5-TN-100**

***Investigation of Area Code Relief for the 920 Area Code in Eastern Wisconsin*
PSCW Docket No. 5-TN-106**

Dear Ms. Paske:

Attached for filing is the “Verizon Companies’ Response to Area Code Relief Implementation – Data Request,” in response to the Commission’s May 16, 2008 data requests in the above-referenced dockets. This response is submitted on behalf of Verizon North Inc., MCImetro Access Transmission Services LLC d/b/a Verizon Access Transmission Services and MCI Communications Services, Inc. d/b/a Verizon Business Services.

We appreciate the Commission’s consideration of this matter.

Sincerely,

/s/ Deborah Kuhn

Counsel for Verizon
Deborah Kuhn

Verizon Companies'¹ Response
715 and 920 Area Code Relief Implementation – Data Request
Docket Nos. 5-TN-100 and 5-TN-106

Please address any customer education and/or implementation issues that may arise for your company that are specific to the following scenarios:

A. An overlay is selected as the Commission's preferred method of relief in both area codes.

Verizon has no concerns with customer education and implementation if an overlay is selected as the preferred method of relief. In fact, customer education will be easier to implement because Verizon would be able to communicate a very similar message to all customers in both the 715 and 920 NPAs. This is Verizon's vastly preferred approach. However, in light of human resource demands, it would be more advantageous to stagger the implementation of the two area codes.

B. An overlay is selected as the Commission's preferred method of relief in one area code while a split is selected for the other area code.

The above scenario would be extremely confusing for customers. For example, if one NPA retains 7 digit dialing and the other NPA changes to 10 digit dialing, this scenario would require two completely different customer education efforts. In addition, for the area code that is split, 50% of the customers in that NPA would require number changes, which they will likely see as unfair when the majority of customers in this scenario will not have to undergo such a burden. Further, this scenario would require a longer implementation for the split method, as compared to the overlay method. The split methodology for area code implementation also requires extra network preparation time due to database conversions. Thus, the area code implementations would definitely need to be staggered.

1. In the split area code, the section along the current 715/920 boundary is assigned the NEW area code.

In addition to the issues addressed in B. above, this scenario would create a higher risk of customer confusion because the customers close to the existing 715/920 boundary would likely see two different – and at times, conflicting – public customer education messages.

2. In the split area code, the section along the current 715/920 boundary retains the EXISTING area code.

In addition to the issues addressed in B. above, this scenario would create a higher risk of customer confusion because the customers close to the existing 715/920 boundary would likely see two different – and at times, conflicting – public customer education messages.

¹ The Verizon Companies are Verizon North Inc., MCImetro Access Transmission Services LLC d/b/a Verizon Access Transmission Services and MCI Communications Services, Inc. d/b/a Verizon Business Services.

Verizon Companies' Response
715 and 920 Area Code Relief Implementation – Data Request
Docket Nos. 5-TN-100 and 5-TN-106

C. A split is selected as the Commission's preferred method of relief in both area codes.

The split method of area code relief presents the most potential for human error and the highest risk of significant customer confusion. If the Commission orders a split, two different sets of customers would be required to change telephone numbers. The selection of this scenario would also result in four (i.e., two for each area code) different and detailed customer education efforts to communicate to those customers that have either kept the same number, or are changing numbers.

The implementation of an area code split is also more time consuming and complicated than an area code overlay. Area code splits require extra network preparation time due to database conversions. This scenario of two area code splits would require two independent conversions that would need to be staggered due to system impacts and human resource needs. The opportunity for human error would also increase greatly as a result of the database conversion work that would be necessary. For more detailed information regarding technical issues that may arise during implementation of a split, the Commission should refer to the Alliance for Telecommunications Industry Solutions' Industry Numbering Committee's (ATIS INC) document ATIS-0300061: *NPA Code Relief Planning and Notification Guidelines*, Appendix F. (<http://www.atis.org/inc/incguides.asp>).

1. Along the current 715/920 boundary, the NEW area code is assigned on each side of the boundary.

In addition to issues addressed in C. above, of all of the scenarios, this one would create the most customer confusion because customers within close proximity of either side of the 715/920 boundary would **all** have to change to a new (and different than each other's) area code. Further, those customers close to the existing 715/920 boundary would likely see two different public customer education messages.

2. Along the current 715/920 boundary, a NEW area code assigned to one side of the boundary line and the EXISTING area code is retained on the other side.

In addition to the issues addressed in C. above, the customers close to the existing 715/920 boundary would likely see two different public customer education messages.

3. Along the current 715/920 boundary, the EXISTING area codes are retained on each side.

In addition to the issues addressed in C. above, the customers close to the existing 715/920 boundary would likely see two different public customer education messages.

Verizon Companies' Response
715 and 920 Area Code Relief Implementation – Data Request
Docket Nos. 5-TN-100 and 5-TN-106

D. Miscellaneous.

- 1. In addressing these issues, please indicate if your company's concerns differ based on whether the 715 or 920 relief effort takes place first.**

Verizon's concerns would not differ based on whether the 715 or 920 relief effort takes place first.

- 2. Does your company have any particular concern about having relief efforts for the 715 and 920 area codes happening in such a close timeframe?**

Due to human resource constraints and technical concerns, and regardless of whether the Commission orders a split or an overlay, Verizon would be concerned if the relief efforts for both area codes happened at the same time. Therefore, Verizon recommends a staggered implementation, especially if a split becomes the Commission's preferred methodology in either or both of the NPAs. As previously stated, if the Commission issues orders sooner rather than later, the industry would establish implementation dates that take into consideration all concerns that may arise.

- 3. Are there any particular problems that may arise for your company if any of the implementation periods for the 715 area code overlap with the implementation periods for 920?**

Please refer to Verizon's responses to D.2 and D.4.

- 4. If so, what implementation steps (if any) should not overlap? Why?**

Verizon's primary concern with timeframe and implementation is that if the Commission orders a split for either or both NPAs, the industry will require a longer implementation timeline, and permissive and mandatory dialing should be staggered. Further, even if the Commission orders the overlay method for both NPAs (resulting in a shorter implementation period), permissive and mandatory dialing should be still staggered. However, if the Commission issues orders soon, based on the current exhaust dates, the industry would establish non-overlapping implementation dates that take into consideration all concerns that may arise.